

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

ADVENTO PENA,

Plaintiff,

v.

**PAVONIA LIFE INSURANCE
COMPANY OF MICHIGAN, f/k/A
HOUSEHOLD LIFE INSURANCE
COMPANY, AND BENEFICIAL FINANCIAL
1 INC.,
Defendants.**

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CIVIL ACTION NO. 7:15-CV-234

**MOTION TO DISMISS ALL CLAIMS AND CAUSES OF ACTION MADE BY
PLAINTIFF ADVENTO PENA AGAINST DEFENDANTS PAVONIA LIFE INSURANCE
COMPANY OF MICHIGAN AND BENEFICIAL FINANCIAL 1 INC. WITH
PREJUDICE**

**TO THE UNITED STATES DISTRICT JUDGE FOR THE SOUTHERN
DISTRICT OF TEXAS:**

The Plaintiff ADVENTO PENA files this Motion to Dismiss Plaintiff's causes of action and claims asserted in this cause against the Defendants PAVONIA LIFE INSURANCE COMPANY OF MICHIGAN and BENEFICIAL FINANCIAL 1 INC. with prejudice.

The Plaintiff ADVENTO PENA brings this motion because he and the Defendants PAVONIA LIFE INSURANCE COMPANY OF MICHIGAN and BENEFICIAL FINANCIAL 1 INC. have reached a compromise and settlement of all claims joined in this litigation or which could have been made in this litigation against the Defendants PAVONIA LIFE INSURANCE COMPANY OF MICHIGAN and BENEFICIAL FINANCIAL 1 INC.

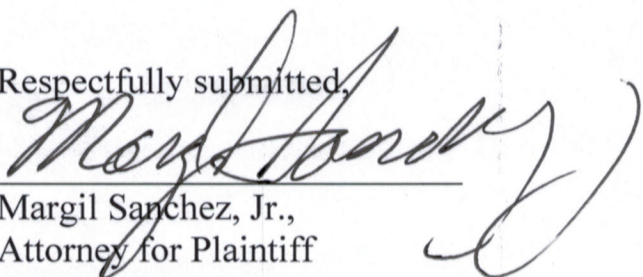
CERTIFICATE OF CONFERENCE

The Attorney for Plaintiff ADVENTO PENA represents to the Court that he has conferred with opposing counsel regarding the substance of this motion and that the Defendants' counsel agree to the filing of this motion as verified by Plaintiff's attorney signature below.

PRAYER

Therefore, based on the settlement made by the parties, the Plaintiff ADVNETO PENA requests that the Court grant this Motion to Dismiss all of Plaintiffs' claims with prejudice to re-file that he has or could have asserted against the Defendant PAVONIA LIFE INSURANCE COMPANY OF MICHIGAN and BENEFICIAL FINANCIAL 1 INC. in the above-captioned and numbered cause.

Respectfully submitted,



Margil Sanchez, Jr.,
Attorney for Plaintiff
ADVENTO PENA

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